

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,) **No. 11-03098-01-CR-S-RED**
)
) Plaintiff,) 18 U.S.C. § 1343
)) NMT 20 Years Imprisonment
v.)) NMT \$250,000 Fine
)) NMT 3 Years Supervised Release
VICKI JEAN GUYNN,) Class C Felony
[DOB: 4-5-61])
) \$100 Mandatory Special Assessment
Defendant.))

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

Parties and Entities

1. **VICKI JEAN GUYNN**, defendant, was an employee of the United States Medical Center for Federal Prisoners Medical Facility (USMCFP) in Springfield, Missouri until she retired from her position in May 2011. The defendant was also the President of the American Federation of Government Employees Local 1612 (Local 1612) for the period of January 2010 through January 2011. The defendant had been the First Vice-President of Local 1612 for five years prior to becoming President.

2. **AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES LOCAL 1612** (**Local 1612**) is a labor organization in Springfield, Missouri, comprised of approximately 350 members. Local 1612 members are employees of USMCFP. Local 1612 represents the bargaining union for employees at the USMCFP. Local 1612's primary source of income is membership dues which are \$338 per year. Dues are paid via check-off directly to American Federation of Government Employees (AFGE) national office, the parent organization of Local

1612. The AFGE national office directly deposits Local 1612's portion of the paid dues into Local 1612's checking account at Bank of America in Springfield, Missouri. Local 1612 executive board consists of the president, treasurer, secretary, first vice president, second vice president, fair practice coordinator, and chief steward. Local 1612 has no full time officers or employees.

The Scheme or Artifice to Defraud

3. The defendant was an employee at the United States Medical Center for Federal Prisoners, located in Springfield, Missouri. The defendant was a secretary in the physical therapy department at the prison. The defendant was also Local 1612's president from January 2010 through January 2011, when she resigned her office. Prior to being the president of Local 1612, the defendant had been a union steward and then Vice-President of Local 1612 for approximately five years until she became president. The local's president is responsible for being the voice of the members, conducting representational duties, running membership and executive board meetings and co-signing the union's checks.

4. During the period covered by the investigation, Local 1612 had one checking account and one savings account. The general checking account was maintained at Bank of America and the savings account was held at Postal Federal Community Credit Union. The authorized signatories on the accounts were Local 1612's Treasurer Lorinda Lansdown and the defendant. Both Lansdown and the defendant had a debit card for the local's checking account.

5. During the time that the defendant was President of Local 1612, she withdrew funds from Local 1612's general checking account at Bank of America, for her own personal use, without the permission or approval of Local 1612.

6. The defendant made eleven unauthorized ATM withdrawals from Local 1612's general checking account at Bank of America from September 2010 through January 2011 totaling \$2,675.24. The \$2,675.24 was withdrawn by the defendant for her personal use. The defendant maintained an ATM card for Local 1612's checking account. Local 1612's ATM card was not to be used by the defendant for personal use

7. The defendant made four unauthorized cash withdrawals from Local 1612's general checking account at Bank of America from November 2010 through December 2010 totaling \$3,902.02. The \$3,902.02 was withdrawn by the defendant for her personal use. Local 1612's general checking account was not to be used by the defendant for personal use.

8. The defendant made 72 unauthorized debit card transactions from the local's Bank of America checking account from August 2010 through January 2011 totaling \$9,497.32. The \$9,497.32 was withdrawn by the defendant for her personal use. The defendant maintained a debit card for the local's checking account. Local 1612's debit card was not to be used by the defendant for personal use.

9. All unauthorized transactions made by the defendant were completed through the use of interstate wire facilities. Any transaction conducted at the Bank of America branch in Springfield which contained Local 1612's general checking account requires interstate wiring in that the local branch accesses the Bank of America computer systems to identify an account and authorize the transaction. Each wire passes through state lines prior to completing the financial transaction. Therefore, interstate wire facilities were used to further the defendant's scheme in all 87 of her unauthorized transactions involving Local 1612's general checking account with Bank of America.

10. As President of Local 1612, during the period of approximately August 6, 2010 until January 10, 2011, the defendant fraudulently obtained approximately \$16,081.58 from Local 1612's general checking account at Bank of America in Springfield, Missouri.

The Wire Communication

11. On or about December 17, 2010, in Greene County, in the Western District of Missouri, and elsewhere, defendant **VICKI JEAN GUYNN** for the purpose of executing and attempting to execute, the scheme and artifice, did transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds that is, a wire communication from a Bank of America computer in Springfield, Missouri, to Bank of America computers in Richmond, Virginia and Richardson, Texas, in order to identify Local 1612's general checking account at Bank of America, before authorizing a transaction where the defendant presented a countercheck for \$500 on Local 1612's general checking account at Bank of America, for payment to the defendant for her personal use, in violation of Title 18, United States Code, Section 1343.

Beth Phillips
United States Attorney

By: /s/ Randall D. Eggert

RANDALL D. EGGERT
Assistant United States Attorney

Dated: 12-15-11
Springfield, Missouri